

The Honorable Stanley A. Bastian

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

DEMETRIOS VORGIAS,

Plaintiff,

v.

COMMUNITY HEALTH OF CENTRAL
WASHINGTON,
Defendant.

Case No.: 1:21-cv-03013-SAB

**PLAINTIFF'S WITNESS
AND EXHIBIT LIST**

Pursuant to the Court's Amended Scheduling Order of October 8, 2021, (ECF No. 24), Plaintiff identifies the following witnesses and exhibits. As noted in the Court's Order, Plaintiff's trial exhibits are to be numbered 1 through 199:

A. WITNESSES.

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2 1. Demetrios Vorgias, c/o Luan T. Le, 1190 S. Bascom Ave, Suite
3 213, San Jose, CA 95128, Tel: (408) 247-4715. This person has discoverable
4 information concerning: (a) Plaintiff's disabilities; (b) Plaintiff's residency at
5 Community Health of Central Washington ("CHCW"); (c) CHCW's
6 discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

7 2. Rebecca Ward – (Plaintiff's Wife). This person has information
8 concerning Plaintiff's disabilities, residency at CHCW and damages.

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10 3. Kelly Cornett, PsyD, CBIS, Rehabilitation Institute of Washington,
11 PLLC, 415 1st Avenue N., Suite 200, Seattle, WA 98109, Tel.: (206) 859-5036.
12 This person has discoverable information concerning: (a) Plaintiff's disabilities.

13 4. Micahlyn Powers, MD, CHCW's Residency Program Director,
14 Tel.: (509) 452-4946. This person has discoverable information concerning: (a)
15 Plaintiff's disabilities; (b) Plaintiff's residency at CHCW; (c) CHCW's
16 discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

17 5. Tess Ish-Shalom, DO MS, 5373 Main Street, Hillsboro, OR
18 97123. This person has discoverable information concerning: (a) Plaintiff's
19 disabilities; (b) Plaintiff's residency at CHCW; (c) CHCW's discriminatory
20 treatment of Plaintiff; (d) Plaintiff's damages.

21 6. Mark J. Bauer M.D., P.O. Box 580, Naches, WA 98937. This
22 person has discoverable information concerning: (a) Plaintiff's disabilities; (b)
23 Plaintiff's residency at CHCW; (c) CHCW's discriminatory treatment of
24 Plaintiff; (d) Plaintiff's damages.

25 7. Ed Prasthofer MD, 108 C Street, Salt Lake City, Utah, 84103,
26 Tel.: (303) 877-1922. This person has discoverable information concerning: (a)
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1 Plaintiff's disabilities; (b) Plaintiff's residency at CHCW; (c) CHCW's
2 discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

3 8. Douglas E. Coon, Regional Medical Director, West Division
4 Envision Healthcare Inc., Tel.: (360) 420-3817. This person has discoverable
5 information concerning: (a) Plaintiff's disabilities; (b) Plaintiff's residency at
6 CHCW; (c) CHCW's discriminatory treatment of Plaintiff; (d) Plaintiff's
7 damages.

8 9. Judith Harvey MD, 902 S 31st Avenue, Yakima WA 98902. This
9 person has discoverable information concerning: (a) Plaintiff's disabilities; (b)
10 Plaintiff's residency at CHCW; (c) CHCW's discriminatory treatment of
11 Plaintiff; (d) Plaintiff's damages.

12 10. Carlin Miller DO, 1806 W Lincoln Avenue, Yakima WA 98902,
13 Tel.: (509)823-6566. This person has discoverable information concerning: (a)
14 Plaintiff's disabilities; (b) Plaintiff's residency at CHCW; (c) CHCW's
15 discriminatory treatment of Plaintiff; (d) Plaintiff's damages.

16 11. Laura Moss MD, Washington Physician's Health Program 720
17 Olive Way Suite 1010, Seattle WA 98101-1819. This person has discoverable
18 information concerning: (a) Plaintiff's disabilities and requests for
19 accommodation(s).

20 12. Cynthia Morales MA, LMHC; Washington Physician's Health
21 Program 720 Olive Way Suite 1010, Seattle WA 98101-1819. This person has
22 discoverable information concerning: (a) Plaintiff's disabilities, and requests
23 for accommodation(s).

24 13. Dr. Scott Whitmer PsyD; Whitmer and Associates, Inc. 205 N 40th
25 Avenue Suite 203, Yakima WA 98908. This person has discoverable
26 information concerning: (a) Plaintiff's disabilities, (b) Plaintiff's Damages.
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1 14. Dr. Ben E. Kitchens MD, 302 Kaki Street, Iuka MS 38852. This
2 person has discoverable information concerning: (a) Plaintiff's disabilities,
3 medical knowledge, professional abilities, and damages.

4 **B. EXHIBITS.**

5 Pursuant to the Court's Amended Scheduling Order, Plaintiffs further
6 provide a description of the exhibits they may offer at the time of trial. Plaintiffs
7 reserve the right to object to the admissibility of any such exhibit, and reserve
8 the right not to offer at trial.

9 1. Previously disclosed/produced, marked herein as Plaintiff's Ex. No.
10 1; Titled: Central Washington Family Medicine Residency Program Resident
11 Handbook.

12 2. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
13 No. 2; Titled: Central Washington Family Medicine Residency Program
14 'Resident Contract in Family Medicine'.

15 3. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
16 No. 3; Titled: Central Washington Family Medicine Residency Verification of
17 Graduate Medical Education & Training.

18 4. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
19 No. 4; Titled: December 11, 2019 letter from Dr. Laura Moss, MD and Cynthia
20 Morales, MA, LMHC at Washington Physicians Health Program (WPHP).

21 5. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
22 No. 5; Titled: April 19, 2019 email from Cynthia Morales at WPHP to Dr.
23 Micahlyn Powers.

24 6. Previously disclosed/produced, and marked herein as Plaintiff's Ex.
25 No. 6; Titled: Neuropsychological Assessment Report of Dr. Kelly Cornett,
26 PsyD, CBIS at Rehabilitation Institute of Washington, PLLC.
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7. Previously disclosed/produced, and marked herein as Plaintiff's Ex. No. 7; Titled: Plaintiff Demetrios Vorgias' Supplemental Initial Disclosure re: Damages (Economic Loss tables only, for illustrative purposes).

8. Previously disclosed/produced, and marked herein as Plaintiff's Ex. No. 8; Titled: Plaintiff's FRCP 26 Initial Expert Witness Disclosure/Report of Dr. Scott Whitmer (for illustrative purposes only).

9. Previously disclosed/produced, and marked herein as Plaintiff's Ex. No. 9; Titled: Plaintiff's Letters of Recommendation from CHCW staff.

10. Previously disclosed/produced, and marked herein as Plaintiff's Ex. No. 10; Titled: Medical Residency Jobs Plaintiff Applied to via Medical Residency Portal.

11. Previously disclosed/produced, and marked herein as Plaintiff's Ex. No. 11; Titled: St. George's University Medical Student Performance Evaluation.

12. Previously disclosed/produced, and marked herein as Plaintiff's Ex. No. 12; Titled: ACGME Institutional Requirements.

DATED this 31st day of January, 2022.

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3 Luan T. Le. CSBA #171029

4 1190 S Bascom Avenue, Suite 213

5 San Jose, CA 95128

6 Email: ledowningllp@gmail.com

7 *Attorney for Plaintiff – Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Attorneys for Defendant

DATED at Yakima, Washington, this 31st day of January, 2022.

By: s/ William D. Pickett
William D. Pickett, WSBA NO. 27867